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SEALED

IN THE UNITED STATES DISTRICT COURT
DISTRICT OF UTAH

UNITED STATES OF AMERICA,

Plaintiff,

vs.

MOLLY REBECCA STANWORTH,

Defendant.

INDICTMENT

VIOLATIONS:

Counts I-V: 18 U.S.C. § 922(a)(6), False
Statement During Acquisition of
Firearms;

Count VI: 18 U.S.C. § 922(g)(3),
Unlawful User of a Controlled Substance
in Possession of a Firearm.

Case: 1:21-cr-00090

Assigned To : Waddoups, Clark

Assign. Date : 8/11/2021

The Grand Jury Charges:

COUNT I

18 U.S.C. § 922(a)(6)

(False Statement During Acquisition of Firearms)

On or about November 23, 2020, in the District of Utah,

MOLLY REBECCA STANWORTH,

defendant herein, in connection with the acquisition of firearms, to wit: a Mossberg

Maverick 88 Cruiser 12 gauge firearm, and two Charles Daly Honcho Tactical 12 gauge

firearms, from a licensed firearm dealer within the meaning of Chapter 44, Title 18, United

States Code, knowingly made a false and fictitious written statement intended and likely to

deceive the firearm dealer with respect to any fact material to the lawfulness of such acquisition of the firearms, in that she falsely answered “no” on ATF form 4473 asking whether she was an unlawful user of or was addicted to a controlled substance, as she then knew, her answer was untrue; all in violation of 18 U.S.C. § 922(a)(6), and punishable pursuant to 18 U.S.C. § 924(a)(2).

COUNT II

18 U.S.C. § 922(a)(6)
(False Statement During Acquisition of Firearms)

On or about December 28, 2020, in the District of Utah,

MOLLY REBECCA STANWORTH,

defendant herein, in connection with the acquisition of firearms, to wit: two Ruger 57 5.7x28mm semi-automatic pistols, from a licensed firearm dealer within the meaning of Chapter 44, Title 18, United States Code, knowingly made a false and fictitious written statement intended and likely to deceive the firearm dealer with respect to any fact material to the lawfulness of such acquisition of the firearms, in that she falsely answered “no” on ATF form 4473 asking whether she was an unlawful user of or was addicted to a controlled substance, as she then knew, her answer was untrue; all in violation of 18 U.S.C. § 922(a)(6), and punishable pursuant to 18 U.S.C. § 924(a)(2).

COUNT III

18 U.S.C. § 922(a)(6)
(False Statement During Acquisition of Firearms)

On or about December 29, 2020, in the District of Utah,

MOLLY REBECCA STANWORTH,

defendant herein, in connection with the acquisition of firearms, to wit: a Ruger LCR .38 caliber revolver and a Springfield XD-E .45 caliber semi-automatic pistol, from a licensed firearm dealer within the meaning of Chapter 44, Title 18, United States Code, knowingly made a false and fictitious written statement intended and likely to deceive the firearm dealer with respect to any fact material to the lawfulness of such acquisition of the firearms, in that she falsely answered “no” on ATF form 4473 asking whether she was an unlawful user of or was addicted to a controlled substance, as she then knew, her answer was untrue; all in violation of 18 U.S.C. § 922(a)(6), and punishable pursuant to 18 U.S.C. § 924(a)(2).

COUNT IV

18 U.S.C. § 922(a)(6)

(False Statement During Acquisition of a Firearm)

On or about January 9, 2021, in the District of Utah,

MOLLY REBECCA STANWORTH,

defendant herein, in connection with the acquisition of a firearm, to wit: an Armscor M1911 A1 9mm semi-automatic pistol, from a licensed firearm dealer within the meaning of Chapter 44, Title 18, United States Code, knowingly made a false and fictitious written statement intended and likely to deceive the firearm dealer with respect to any fact material to the lawfulness of such acquisition of the firearm, in that she falsely answered “no” on ATF form 4473 asking whether she was an unlawful user of or was addicted to a controlled substance, as she then knew, her answer was untrue; all in violation of 18 U.S.C. § 922(a)(6), and punishable pursuant to 18 U.S.C. § 924(a)(2).

COUNT V

18 U.S.C. § 922(a)(6)

(False Statement During Acquisition of Firearms)

On or about January 18, 2021, in the District of Utah,

MOLLY REBECCA STANWORTH,

defendant herein, in connection with the acquisition of firearms, to wit: two Smith & Wesson M&P40 .40 caliber semi-automatic pistols, from a licensed firearm dealer within the meaning of Chapter 44, Title 18, United States Code, knowingly made a false and fictitious written statement intended and likely to deceive the firearm dealer with respect to any fact material to the lawfulness of such acquisition of the firearms, in that she falsely answered “no” on ATF form 4473 asking whether she was an unlawful user of or was addicted to a controlled substance, as she then knew, her answer was untrue; all in violation of 18 U.S.C. § 922(a)(6), and punishable pursuant to 18 U.S.C. § 924(a)(2).

COUNT VI

18 U.S.C. § 922(g)(3)

(Unlawful User of a Controlled Substance in Possession of a Firearm)

On or about December 28, 2020 and continuing through June 16, 2021, in the District of Utah,

MOLLY REBECCA STANWORTH,

defendant herein, knowing she was an unlawful user of and addicted to a controlled substance, as defined in 21 U.S.C. § 802, knowingly possessed a firearm, to wit: a Ruger LCR .38 caliber revolver, and the firearm was in and affecting commerce; all in violation of 18 U.S.C. § 922(g)(1).

NOTICE OF INTENT TO SEEK FORFEITURE

Pursuant to 18 U.S.C. § 924(d)(1) and 28 U.S.C. § 2461(c), upon conviction for any offense violating 18 U.S.C. § 922, the defendant shall forfeit to the United States of America any firearm or ammunition involved in or used in the commission of the offense, including but not limited to:

- Mossberg Maverick 88 Cruiser 12 gauge firearm, serial number MV0537142
- Charles Daly Honcho Tactical 12 gauge firearm, serial number 20PA12V-1382
- Ruger 57 5.7x28mm semi-automatic pistol, serial number 641-79250
- Ruger LCR .38 caliber revolver, serial number 1542-58313
- Springfield XD-E .45 caliber semi-automatic pistol, serial number HE117310
- Any associated ammunition

A TRUE BILL:



FOREPERSON OF GRAND JURY

ANDREA T. MARTINEZ
Acting United States Attorney



VICTORIA K. McFARLAND
Assistant United States Attorney